

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

---

MILLIMAN, INC., MILLIMAN  
SOLUTIONS, LLC, and VIGILYTICS  
LLC,

Plaintiffs,

v.

GRADIENT A.I. CORP., STANFORD A.  
SMITH, and SAMUEL CHASE PETTUS,

Defendants.

---

Civil Action No. 1:21-cv-10865-NMG

**DEFENDANTS' ASSENTED-TO MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Rule 7.2, Defendants Gradient A.I. Corp., Stanford A. Smith, and Samuel Chase Pettus, by and through undersigned counsel, hereby move for leave to file under seal certain material concerning Defendants' forthcoming opposition to Plaintiffs' Renewed Motion to Compel Discovery Responses (Dkt. No. 71). Defendants' opposition brief will disclose material from Plaintiffs' trade secret disclosure, which is among the exhibits that the Court granted Plaintiffs' request to be filed under seal (Dkt. No. 75). Plaintiffs' counsel assented to this motion.

WHEREFORE, for the reasons set forth above, Defendants respectfully request that the Court grant this motion to allow Defendants to file under seal an unredacted version of their forthcoming opposition to Plaintiffs' Renewed Motion to Compel. Defendants will publicly file a redacted version of their opposition brief.

Respectfully submitted,

GRADIENT A.I. CORP., STANFORD A.  
SMITH, and SAMUEL CHASE PETTUS

By their attorneys,

/s/ Kevin C. Quigley

Paul D. Popeo (BBO No. 567727)

Michael H. Bunis (BBO No. 566839)

Sophie F. Wang (BBO No. 679642)

Kevin C. Quigley (BBO No. 685015)

CHOATE, HALL & STEWART LLP

Two International Place

Boston, MA 02110

Tel.: (617) 248-5000

Fax: (617) 248-4000

*ppopeo@choate.com*

*mbunis@choate.com*

*swang@choate.com*

*kquigley@choate.com*

Dated: August 25, 2022